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1
           IN THE UNITED STATES DISTRICT COURT FOR THE
2
                   NORTHERN DISTRICT OF OKLAHOMA
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4
     W. A. DREW EDMONDSON, in his )
5
     capacity as ATTORNEY GENERAL )
     OF THE STATE OF OKLAHOMA and )
6
     OKLAHOMA SECRETARY OF THE
     ENVIRONMENT C. MILES TOLBERT,)
7
     in his capacity as the
     TRUSTEE FOR NATURAL RESOURCES)
8
     FOR THE STATE OF OKLAHOMA,
9
                  Plaintiff,
10
                                    ) 4:05-CV-00329-TCK-SAJ
     vs.
11
     TYSON FOODS, INC., et al,
12
                  Defendants.
13
14
                       THE VIDEOTAPED 30(b)(6)
15
     DEPOSITION OF STEVEN PATRICK, produced as a
16
     witness on behalf of the Plaintiff in the above
17
     styled and numbered cause, taken on the 21st day of
18
     August, 2007, in the City of Fayetteville, County of
19
     Washington, State of Arkansas, before me, Lisa A.
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     Steinmeyer, a Certified Shorthand Reporter, duly
21
     certified under and by virtue of the laws of the
22
     State of Oklahoma.
23
24
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TULSA FREELANCE REPORTERS 918-587-2878

EXHIBIT

1	to any other sources where this information might be			
2	found, such as a university.			
3	MR. GEORGE: David, is your question			
4	limited to studies relevant to the Illinois River			
5	watershed?	09:49AM		
6	MR. RIGGS: I think it should be according			
7	to			
8	A . Illinois River watershed? I am not aware.			
9	Q Okay. Let's talk about the total amount of			
10	waste produced, not just what individual birds might	09:49AM		
11	produce in the form of excrement. Let's look at			
12	Inquiry No. 11 now on that list, and I want you to			
13	tell me if you are the person designated to speak			
14	for the Tyson entities on that area and if you are			
15	prepared to do that. 09:49AM			
16	A Yes to both.			
17	Q Okay, and when I'm saying we're including			
18	Cobb-Vantress. I get a little confused about which			
19	witness is going to speak for them, but you're			
20	speaking for them and the three other Tyson	09:49AM		
21	entities; correct?			
22	A Correct.			
23	Q Does Tyson currently own, that is, any of			
24	those entities or directly operate or maintain			
25	houses in which their chickens are fed?	09:50AM		
	1			

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. 1	A	Yes.				
2		Okay. Is it Cobb-Vantress only that does				
	Q					
3	curre	currently?				
4	A	Currently, yes.				
5	Q	All right. Okay, and what kind of chickens	09:50AM			
6	are i	n those houses?	:			
7	A	Well, at Cobb-Vantress you would have I				
8	would have to go back to the specifics in the					
9	Illinois River watershed, but typically					
10	Cobb-	Vantress is the parents and grandparents and	09:50AM			
11	great	grandparents and typically not what we would				
12	consider broilers. Cobb-Vantress makes the birds					
13	that they sell to other companies.					
14	Q	They're breeding stock; is that correct?				
15	A	Yes, that's correct.	09:50AM			
16	Q	Is that a good way of putting it?				
17	A	That's the best way of putting it. I wanted				
18	to be	clear on what it was.				
19	Q	Okay. Did Tyson any of these other Tyson				
20	entit:	ies own or maintain houses in which its birds	09:51AM			
21	were :	fed at some other time? I know they don't now.				
22	A	Yes.				
23		MR. GEORGE: In the Illinois River				
24	watershed?					
25		MR. RIGGS: Yeah, in the Illinois River	09:51AM			

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1	watershed.			
2	A Yes.			
3	Q And what kind of birds were in those houses			
4	which were owned and operated by Tyson?			
5	A Well, I think we would have had broilers. I 09:51AM			
6	believe that's what would have been in there, and I			
7	would need to go back to verify, but I'm pretty sure			
8	we had broilers in them.			
9	Q Do you know if Tyson, during that time it was			
10	owning and operating its own broiler houses in the 09:51AM			
11	Illinois River watershed, ever weighed or measured			
12	the amount of waste coming out of those houses when			
13	it was removed?			
14	A On weighing, I do not have records of them			
15	weighing what was coming out of the houses. I did 09:52AM			
16	not have that information.			
17	Q Do you know if they did or didn't do that?			
18	A I am not aware of any weighing that was			
19	conducted.			
20	Q Do you know if they measured it some other 09:52AM			
21	way, such as a truck load or by cubic feet or			
22	anything like that?			
23	A I have no information on any kind of weight or			
24	measurement of what was coming out of the houses at			
25	these specific locations we're talking about in the 09:52AM			

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1	Illinois River watershed and the broiler houses.			
2	$oldsymbol{Q}$ Right. Do you know what type of equipment was			
3	used to remove that poultry waste from the floors of			
4	those houses?			
5	A No.	09:52AM		
6	Q Do you know what kind of truck was used to			
7	haul it, like the capacity of the truck or anything			
8	of that sort?			
9	A No.			
10	Q Do you know if Tyson had others remove the	09:52AM		
11	poultry waste from the houses where its broilers			
12	were maintained in the Illinois River watershed?			
13	MR. GEORGE: David, is your question again			
14	limited to what was previously the company-owned and	•		
15	managed farms? 09:53AM			
16	MR. RIGGS: Yes.			
17	Q Not your growers' houses but that Tyson owned			
18	and operated houses.			
19	A Can you repeat that question? I want to make			
20	sure I'm answering.	09:53AM		
21	$oldsymbol{Q}$ Yeah. I'm wondering if when the poultry waste			
22	was removed from those houses, the Tyson-owned and			
23	operated houses in the Illinois River watershed, if			
24	other companies or other parties were hired to			
25	remove that waste.	09:53AM		

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1	A	I do not have any information on that.			
2	Q	So you wouldn't know if they measured it			
3	either	I guess?			
4	A	I would not know that, and so that I am clear,			
5	we are	talking about cleaning out the house for	09:53AM		
6	poultr	poultry litter?			
7	Q	Right, a complete cleanout.			
8	A	That's what I want to make sure. No, I do not			
9	have a	my information on that.			
10	Q	Do you have information from some other way?	09:54AM		
11	I'm trying to approach it so that I could understand				
12	how this might be learned. Do you have any				
13	information about how much waste would come out of				
14	the va	rious kinds of poultry houses in the Illinois			
15	River watershed, these houses that are owned by 09:54AM				
16	Tyson?				
17	A	No.			
18	Q	As far as you know, Tyson has no records			
19	regard	ling the amount of poultry waste that is			
20	genera	ted over a certain period of time in one of	09:54AM		
21	its owned houses?				
22	A	That is correct.			
23	Q	Let's talk about the houses in the Illinois			
24	River	watershed where Tyson birds are fed by			
25	contra	ct growers. Do you have	09:54AM		

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